

RECEIVED
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
Northern DIVISION 8:57

Steve J Nemo
1033 LouBerry Lane
Prattville, AL 36067
PLAINTIFF

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

v.

CASE ACTION NO.: 2:17-cv-734-MHT

RR Dowlalley / Logistics Services
C/O Rick Lopez - Human Resource Dir
4962 Distribution Drive Tampa, FL.
DEFENDANT 33605

JURY DEMAND (MARK ONE)

☒ YES ☐ NO

EEOC COMPLAINT

1. Plaintiff resides at 1033 LouBerry Lane Prattville, AL 36067
2. Defendant(s)' name(s) RR Dowlalley / Logistics Services C/O Rick Lopez Human Resource Dir 4962 Distribution Drive Tampa, FL. 33605
Location of principal office(s) of the named defendant(s) 4962 Distribution Drive Tampa, FL. 33605. RR Dowlalley / Logistics Services.

Nature of defendant(s)' business Logistics Delivery Service

Approximate number of individuals employed by defendant(s) 500 or more

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 §2000e-5(g).

4. The acts complained of in this suit concern:

1. ☐ Failure to employ me.
2. ☒ Termination of my employment.
3. ☐ Failure to promote me.
4. ☐ Other acts as specified below: _____

5. Plaintiff is:

A. ☐ Presently employed by the defendant.
☒ Not presently employed by the defendant. The dates of employment were
5/8/17 - 8/13/17 Employment was terminated because:

- (1) ☒ Plaintiff was discharged.
 (2) ☐ Plaintiff was laid off.
 (3) ☐ Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. ☒ My race.
 B. ☐ My religion.
 C. ☒ My sex.
 D. ☐ My national origin.
 E. ☒ Other, as specified below: AGE - MADE DEROGATORY STATEMENT ABOUT MY AGE SAYING THAT I LOOKED LIKE A FLIP-PHONE PERSON.

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are) FELTON BURROUGHS Black male HUB SUPERVISOR

8. The alleged discrimination occurred on or about April 27 - Aug. 13, 2017.

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows:

ON OR ABOUT April 27, 2017 FELTON BURROUGHS, Patricia Reese and Steve Nemo met in Prattville to discuss the employment with RR Donnelley and Logistics Services. During the meeting he noted that he rather have a female in charge in this area than a male, Patricia and I look at each other in shock we ask why because a female gets more respect than a male - FELTON would discuss my pay with her TELL HER with her husband - David Reese that he prefer to pay Patricia Reese the money for the Auburn/Opeika route that Steve Nemo is making so much money. when I ask why I haven't got paid for the route he would rather tell me about my job; FELTON would tell me he's getting ready to make changes - FELTON would tell Patricia to be ready to take over Jim making changes make sure you have your people ready to start work - I was replaced by a white driver (Female)

10. The alleged illegal activity took place at 201 37th St. North Birmingham, Al. 35222 - Logistics Services.

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about SEP. 20, 2017.
I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. The letter was received by me on OCT. 08, 2017

12. I seek the following relief:

- A. ☒ Recovery of back pay.
B. ☒ Reinstatement to my former job, and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorneys fees.

Date: 10/27/2017

Steve J. Nemo
Signature of Plaintiff

Steve J. Nemo
1033 Lou Berry Lane
Prattville, AL 36067 334-313-6944
Address & Telephone Number of Plaintiff